

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

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) CIVIL ACTION NO.
) **04-CV-10357-RCL**
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**DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

The Defendant, Moshe Hananel ("Hananel"), hereby opposes the Motion for Default Judgment filed by the Plaintiff, Sheldon G. Adelson ("Adelson"). In support of this Opposition, Hananel states the following:

1. On January 28, 2008 Hananel filed a Motion to Stay Proceedings ("Motion to Stay"), along with a "Motion to Extend Time to File and Serve Answer and Opposition to Motion for Summary Judgment Until Decision on Motion to Stay Proceedings."

2. Hananel filed the Motion to Stay due to prior pending litigation in Israel involving the same parties and issues, of which this Court has found the present action to be a duplicate [See Dkt #87, Forum Non Conveniens Recommendation, 3/28/06], and due to the fact that the Israeli litigation is now in trial and nearing conclusion.

3. The Motion to Stay is scheduled for hearing before this Court on February 29, 2008 at 2:15 P.M.

4. If the Motion for Stay is allowed, no responsive pleading need be filed by Hananel, at least so long as the stay remains in place. If the Motion for Stay is denied, Hananel will be prepared to file his responsive pleading within three days of such ruling.

5. Adelson will not be prejudiced in any manner whatsoever by the extension sought by Hananel.

WHEREFORE, the Defendant prays that this Court deny the Plaintiff's Motion for Default Judgment.

Respectfully submitted,
By their attorneys

/s/ James A.G. Hamilton
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Dated: February 22, 2008

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 22, 2008.

/s/ James A.G. Hamilton
James A.G. Hamilton